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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

In re Lyft, Inc. Securities Litigation,

This document relates to:

ALL ACTIONS

Lead Case No.: 4:19-cv-02690-HSG

**Joint Stipulation and Order Granting  
Lead Plaintiff's Motion to Remove  
Incorrectly Filed Documents**

Judge: The Hon. Haywood S. Gilliam, Jr.

Pursuant to Civil L.R. 7-11(a) and 7-12, Lead Plaintiff Rick Keiner (“Lead Plaintiff”) and Defendants Lyft, Inc., Logan Green, John Zimmer, Brian Roberts, Prashant (Sean) Aggarwal, Ben Horowitz, Valerie Jarrett, David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes Wilderotter (“Defendants”) (together the “Parties”), through their counsel, submit the following Joint Stipulation and [Proposed] Order regarding Lead Plaintiff’s Motion to Remove Incorrectly Filed Documents.

WHEREAS, on May 24, 2021, at 2:30pm Lead Plaintiff filed his Administrative Motion to Seal at ECF 158 (“Motion to Seal”);

WHEREAS, two attachments to Lead Plaintiff’s Motion to Seal, (1) Lead Plaintiff’s Opposition to Defendants’ Motion for Judgment on the Pleadings [REDACTED VERSION OF DOCUMENT(S) SOUGHT TO BE SEALED] (ECF 158-3); and (2) the Declaration of Jeffrey C. Block in Support of Lead Plaintiff’s Opposition to Defendants’ Motion for Judgment on the Pleadings [REDACTED VERSION OF DOCUMENT(S) SOUGHT TO BE SEALED] (ECF 158-5) (together the “Two Attachments”) were inadvertently filed with unredacted confidential information;

WHEREAS, Lead Counsel promptly contacted via telephone the ECF HelpDesk (866-638-7829) which placed a lock on the Two Attachments by no later than 3:00pm;

WHEREAS, on May 28, 2021, Defendants filed a declaration pursuant to Civil L.R. 79-5(e)(1) arguing that the material they have designated as “confidential” is sealable under Civil L.R. 79-5(b) and do not believe the designated information contained in the Two Attachments should be publicly available (ECF 164);

WHEREAS, on May 28, 2021, the Magistrate Judge granted an earlier motion to seal the same information that was designated “confidential” in the Two Attachments (ECF 161);

WHEREAS, on June 16, 2021 Lead Plaintiff filed a corrected Administrative Motion to Seal with corrected copies of the Two Attachments;

NOW, THEREFORE, the Parties hereby stipulate, subject to Court approval, that the Two Attachments, filed electronically at ECF 158-3 and ECF 158-5, be removed from the docket.

Stipulated and agreed to by:

Date: June 16, 2021

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**FILER'S ATTESTATION**

Pursuant to Civil L. R. 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the other signatories hereto.


Dated: June 16, 2021

/s/ Whitney E. Street  
Whitney E. Street

\* \* \*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 6/17/2021

  
Haywood S. Gilliam, Jr.  
U.S. District Court Judge